

ORIGINAL

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF TEXAS

FORT WORTH DIVISION

FILED
U.S. DISTRICT COURT
NORTHERN DIST. OF TX
FT. WORTH DIVISION

2014 JUL 25 PM 4:08

CLERK OF COURT

UNITED STATES OF AMERICA

v.

CHRISTOPHER ROBERT WEAST

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4:14-CR-0023 - A

DEFENDANT'S NOTICE REGARDING JURY INSTRUCTIONS

COMES NOW, the Defendant, CHRISTOPHER ROBERT WEAST, by his counsel, Angela Saad, Assistant Federal Public Defender, and hereby files this notice regarding jury instructions and voir dire.

Defense counsel was unable to agree on the questions presented to jury during jury instructions and voir dire. The jury will ultimately see the images Defense counsel requests the following questions be asked:

Defense counsel has consulted with the government regarding this proposal. While the jury will not see the images until deliberations, that does not limit the likelihood that the jurors will disregard or not listen to the evidence because the case involves child pornography itself or include images of disturbing material. In order to ensure a fair trial in which the jury will stand by their oath to consider all the evidence, defense counsel requests the following:

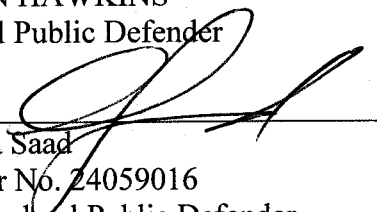
As jurors, you will be required to see images and a video of alleged child pornography that are disturbing and offensive.

1. Would anyone be unable to render a verdict of not guilty after viewing alleged images of child pornography should the government fail to prove beyond a reasonable doubt any element of offense?

2. Because this case involves child pornography, would anyone be more likely to find or agree with the government in a close call?
3. After viewing these images of alleged child pornography, would you disregard the evidence in this case and hold the government a lower standard than is required by the constitution?
4. Upon seeing the type of images described, would anyone favor the government in this case?
5. Would anyone believe the defendant is automatically guilty because this case involves child pornography or after viewing the alleged images of child pornography?

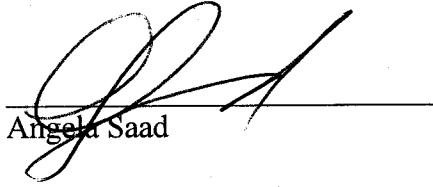
Defense respectfully request the court address these questions to the jury.

Respectfully submitted,
JASON HAWKINS
Federal Public Defender

BY: 
Angela Saad
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Attorney for Defendant

CERTIFICATE OF SERVICE

I, Angela Saad, hereby certify that on July 25, 2014, a copy of the foregoing notice was hand delivered to Assistant United States Attorney Aisha Saleem at 801 Cherry St., Suite 1700, Fort Worth, Texas 76102-6897.


Angela Saad